

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

In Re:)
)
In the Matter of Petition of Sprint Communications)
Company L.P. and Sprint Spectrum L.P. d/b/a Sprint PCS)
for Arbitration of Rates, Terms and Conditions of) **Docket No. 2007-215-C**
Interconnection with BellSouth Telecommunications, Inc.)
d/b/a AT&T South Carolina d/b/a AT&T Southeast)
)
)

(Please type or print)

Submitted by:	J. Jeffrey Pascoe	SC Bar Number:	71104
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	Greenville, SC 29601	Fax:	864.239.5855
		Other:	
		Email:	jpascoe@wcsr.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

- ☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☒ Other: **MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL**

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

IN THE MATTER OF PETITION OF SPRINT COMMUNICATIONS COMPANY L.P. AND SPRINT SPECTRUM L. P. D/B/A SPRINT PCS FOR ARBITRATION OF RATES, TERMS AND CONDITIONS OF INTERCONNECTION WITH BELL SOUTH TELECOMMUNICATIONS, INC. D/B/A AT&T SOUTH CAROLINA D/B/A AT&T SOUTHEAST	Docket No. 2007-215-C
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MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL

NOW COMES, J. Jeffrey Pascoe of Womble Carlyle Sandridge & Rice, PLLC (“WCSR”), counsel for Sprint Communications Company L.P. and Sprint Spectrum L.P. (“Petitioners”), and moves the South Carolina Public Service Commission (the “Commission”) for permission for Mr. Pascoe and WCSR to withdraw as counsel of record, and to substitute John J. Pringle, Jr., of Ellis, Lawhorne & Sims, P.A. (“Ellis Lawhorne”) as counsel of record for Petitioners in this matter (the “Petition”). In support of this Motion, the undersigned respectfully shows the Commission the following:

1. On May 29, 2007, Petitioners commenced the Petition against BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina d/b/a AT&T Southeast (“AT&T”).
2. Mr. Pascoe signed the Petition as counsel of record for Petitioners.
3. After hearing testimony and considering oral and written arguments by the parties, the Commission denied AT&T’s Motion to Dismiss for lack of jurisdiction but stayed the proceedings and deferred to the FCC to decide the matters at issue in the Petition. Therefore, the withdrawal of Mr. Pascoe and WCSR can be accomplished without material adverse effect on Petitioners.
4. No scheduled hearing will be delayed by the granting of this motion to withdraw.

5. Petitioners are aware of and consent to this motion to withdraw and substitute counsel.

6. Upon the withdrawal of Mr. Pascoe and WCSR, Mr. Pringle and Ellis Lawhorne will serve as counsel of record for Petitioners in the Petition. Mr. Pringle and Ellis Lawhorne hereby give notice of appearance on behalf of Petitioners in the Petition.

WHEREFORE, J. Jeffrey Pascoe and the law firm of Womble Carlyle Sandridge & Rice, PLLC respectfully request permission to withdraw as counsel for the Petitioners and that John J. Pringle, Jr. and the law firm of Ellis, Lawhorne & Sims, P.A. be permitted to appear on behalf of Petitioners in this Petition.

Respectfully submitted this 6th day of December, 2007.

/s/ J. Jeffrey Pascoe
J. Jeffrey Pascoe
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/s/ John J. Pringle, Jr.
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BEFORE THE

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In Re:)
In the Matter of Petition of Sprint)
Communications Company L.P. and)
Sprint Spectrum L.P. d/b/a Sprint)
PCS for Arbitration of Rates, Terms)
and Conditions of Interconnection)
with BellSouth)
Telecommunications, Inc. d/b/a)
AT&T South Carolina d/b/a AT&T)
Southeast)

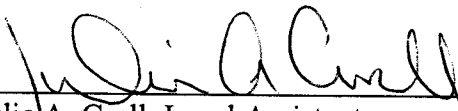
Docket No. 2007-215-C

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 6, 2007, she served a copy of the attached **MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL** by first-class mail, proper postage affixed addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es):

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